

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

WHA

UNITED STATES OF AMERICA,

v.

CR19

0367

EDUARDO ALFONSO VIERA-CHIRINOS,
et al.,

FILED

AUG -8 2019

DEFENDANT(S).

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

INDICTMENT

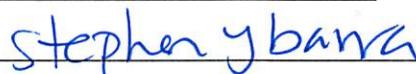
VIOLATIONS: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances; 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Controlled Substances; 21 U.S.C. § 853 - Forfeiture Allegation

A true bill.



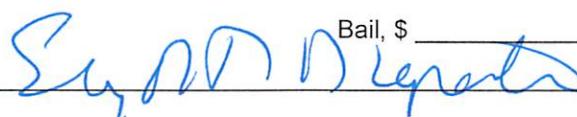
Foreman

Filed in open court this 8 day of August 2019



Clerk

Bail, \$ _____



Bailiff

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine;

21 U.S.C. § 841(a)(1) and (b)(1)(A), (b)(1)(B) - Possession with Intent to Distribute Heroin and Cocaine

 Petty Minor Misdemeanor Felony

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

PENALTY: See Attachment.

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

 person is awaiting trial in another Federal or State Court, give name of court this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District this is a reprosecution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

 this prosecution relates to a pending case involving this same defendant prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

MAGISTRATE CASE NO.

19-71145

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

 U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) JULIE D. GARCIA

DEFENDANT - U.S.

EDUARDO ALFONSO VIERA-CHIRINOS

DISTRICT COURT NUMBER

CR19-0367

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges

FILED

2) Is a Fugitive

AUG - 8 2019

3) Is on Bail or Release from (show District)

SUSAN Y. SOONG

CLERK, U.S. DISTRICT COURT

NORTH DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge5) On another conviction} Federal State6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
been filed? No} If "Yes"
give date
filedDATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

 This report amends AO 257 previously submitted

PROCESS:

 SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

 Arraignment Initial Appearance

Defendant Address: _____ Date/Time: _____ Before Judge: _____

Comments: _____

Attachment to Penalty Sheet
Eduardo Alfonso Viera-Chirinos a/k/a "Rojo"

Count One - 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(B)

- Minimum 5 years and maximum 40 years' imprisonment;
- Maximum \$5,000,000 fine;
- Minimum 4 years and maximum lifetime supervised release;
- \$100 special assessment;
- Potential denial of federal benefits;
- Potential deportation

CR19 0367

Count Two

- **21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)**
 - Minimum 10 years and maximum life imprisonment;
 - Maximum \$10,000,000 fine;
 - Minimum 5 years and maximum lifetime supervised release;
 - \$100 special assessment;
 - Potential denial of federal benefits;
 - Potential deportation
- **21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(B)**
 - Minimum 5 years and maximum 40 years' imprisonment;
 - Maximum \$5,000,000 fine;
 - Minimum 4 years and maximum lifetime supervised release;
 - \$100 special assessment;
 - Potential denial of federal benefits;
 - Potential deportation

WHA

FILED

AUG - 8 2019

SUSAN Y. COONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

VICTOR MANUEL VIERA-CHIRINOS

WHA

DISTRICT COURT NUMBER

CR19-0367

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges →
 2) Is a Fugitive → FILED
 3) Is on Bail or Release from (show District)
 AUG - 8 2019

SUSAN Y. SOONG

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA4) On this charge5) On another conviction } → Federal State6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

Month/Day/Year

DATE OF ARREST →
 Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY →

Month/Day/Year

 This report amends AO 257 previously submitted

Name and Office of Person
 Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned) JULIE D. GARCIA

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WHA

DEFENDANT - U.S.

JORGE ALBERTO VIERA-CHIRINOS

DISTRICT COURT NUMBER

CR19 0387

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges **11-LED**
2) Is a Fugitive **AUG -8 2019**
3) Is on Bail or Release from (show District) **AN Y. SOONG**
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge
5) On another conviction } Federal State
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer Yes
been filed? No

} If "Yes"
give date
filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

Name and Office of Person
Furnishing Information on this form **DAVID L. ANDERSON**

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
Attorney (if assigned) **JULIE D. GARCIA**

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. § 841(a)(1) and (b)(1)(C) - Possession with Intent to Distribute Heroin

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Maximum 20 years' imprisonment;
 Maximum \$1,000,000 fine;
 3 years to lifetime supervised release;
 \$100 mandatory special assessment;
 Potential denial of federal benefits; potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

→ JULIO CESAR VIERA-CHIRINOS

WHA

DISTRICT COURT NUMBER

CR19 0367

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.
 1) If not detained give date any prior summons was served on above charges →

2) Is a Fugitive

FILED

3) Is on Bail or Release from (show District)

AUG - 8 2019

SUSAN Y. SOONG

CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

DATE OF ARREST →

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY →

Month/Day/Year

This report amends AO 257 previously submitted

Name and Office of Person
 Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned)

JULIE D. GARCIA

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

JORGE ENRIQUE TORRES-VIERA

DISTRICT COURT NUMBER

CR19 0367

WHA

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

MAGISTRATE CASE NO.

19-71145 TSH

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) JULIE D. GARCIA

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges →
 2) Is a Fugitive AUG - 8 2010
 3) Is on Bail or Release from (show District) SUSAN Y. SOONG
 NORTH DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge
 5) On another conviction } Federal State
 6) Awaiting trial on other charges
 If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

DATE OF ARREST →

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY →

Month/Day/Year

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Arraignment Initial Appearance

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WHA

DEFENDANT - U.S.

KAREN CASTRO-TORRES

DISTRICT COURT NUMBER

CR19 0367

DEFENDANT

IS NOT IN CUSTODY

FILED

Has not been arrested, pending outcome of this proceeding.
 1) If not detained give date any prior summons was served on above charges

AUG 6 2019

2) Is a Fugitive

SUSAN Y. SONG

CLERK, U.S. DISTRICT COURT

3) Is on Bail or Release from (show District)

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

DATE OF
 ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY

Month/Day/Year

Name and Office of Person
 Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned)

JULIE D. GARCIA

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

DEFENDANT - U.S.

CILDER RAMON GAMEZ-VELASQUEZ

DISTRICT COURT NUMBER

CR19 0367

WHA

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.
 1) If not detained give date any prior summons was served on above charges

2) Is a Fugitive

AUG - 8

3) Is on Bail or Release from (show District)
 SUSAN Y. L. CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

Month/Day/Year

DATE OF
 ARREST

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

Name and Office of Person
 Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned) JULIE D. GARCIA

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine;
 21 U.S.C. § 841(a)(1) and (b)(1)(A), (b)(1)(B) - Possession with Intent to Distribute Heroin and Cocaine

PENALTY: See Attachment.

Petty
 Minor
 Misdemeanor
 Felony

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

ALEXANDER GONZALEZ-VASQUEZ

DISTRICT COURT NUMBER

CR19 0367 WHA

DEFENDANT

FILED

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges AUG - 8 2010

2) Is a Fugitive

SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA

3) Is on Bail or Release from (show District)

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

Month/Day/Year

DATE OF ARREST

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) JULIE D. GARCIA

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

Attachment to Penalty Sheet
Alexander Gonzalez-Vasquez a/k/a "Ale"

Count One - 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(B)

- Minimum 5 years and maximum 40 years' imprisonment;
- Maximum \$5,000,000 fine;
- Minimum 4 years and maximum lifetime supervised release;
- \$100 special assessment;
- Potential denial of federal benefits;
- Potential deportation

Count Two

- **21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)**
 - Minimum 10 years and maximum life imprisonment;
 - Maximum \$10,000,000 fine;
 - Minimum 5 years and maximum lifetime supervised release;
 - \$100 special assessment;
 - Potential denial of federal benefits;
 - Potential deportation
- **21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(B)**
 - Minimum 5 years and maximum 40 years' imprisonment;
 - Maximum \$5,000,000 fine;
 - Minimum 4 years and maximum lifetime supervised release;
 - \$100 special assessment;
 - Potential denial of federal benefits;
 - Potential deportation

WHA

CR19 0367

FILED

AUG - 8 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WHA

DEFENDANT - U.S.

GUSTAVO ADOLFO GAMEZ-VELASQUEZ

CR19 0367

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.
 1) If not detained give date any prior summons was served on above charges

7-7-2019
 ARRESTED

2) Is a Fugitive

3) Is on Bail or Release from (show District)

AUG -8 2019
 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

Month/Day/Year

DATE OF
 ARREST

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

Name and Office of Person
 Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned) JULIE D. GARCIA

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

LUIS ALMICAR ERAZO-CENTENO

WHA

DISTRICT COURT NUMBER

CR19 0387

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCr 20, 21, or 40. Show District

this is a reprocsecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

19-71145 TSH

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) JULIE D. GARCIA

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges →
 2) Is a Fugitive → FILED
 3) Is on Bail or Release from (show District) 2019

SHAWN Y. COONG

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge
 5) On another conviction } Federal State
 6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed _____

DATE OF
ARREST →

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY →

Month/Day/Year

This report amends AO 257 previously submitted

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

RODULIO ALEXO GARCIA

DISTRICT COURT NUMBER

CR19 0367

DEFENDANT

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

JULIE D. GARCIA

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges

2) Is a Fugitive

3) Is on Bail or Release from (show District)

AUG - 8 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
been filed? No

} If "Yes"
give date
filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: No bail

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

► JUAN VELASQUEZ-ESCOTO

WHA

DISTRICT COURT NUMBER

CR19 0387

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.
 1) If not detained give date any prior summons was served on above charges

AUG -8 2019

SUSAN Y. SOONG
 CLERK, NORTHERN DISTRICT OF CALIFORNIA

2) Is a Fugitive

3) Is on Bail or Release from (show District)

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

Name and Office of Person
 Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned) JULIE D. GARCIA

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: No bail

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WHA

DEFENDANT - U.S.

ELVIN MEJIA PADILLA

DISTRICT COURT NUMBER

CR19 0367

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

JULIE D. GARCIA

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges

2) Is a Fugitive

AUG -8 2019

3) Is on Bail or Release from (show District)

SUSAN Y. SOONG
CLERK OF COURT
NORTHERN DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
been filed? No

} If "Yes"
give date
filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: No bail

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprocution of charges previously dismissed
 which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

MAGISTRATE CASE NO.

3:19-71206 EDL

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

JULIE D. GARCIA

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

YORDI YABIER AGURCIA GALINDO

WHA

DISTRICT COURT NUMBER

CR19 0367

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges

2) Is a Fugitive

3) Is on Bail or Release from (show District)

AUG - 8 2019

IS IN CUSTODY

4) On this charge

5) On another conviction

} Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

DATE OF
 ARREST

Month/Day/Year
 August 7, 2019

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute Heroin, Methamphetamine, Cocaine Base, and Cocaine

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Minimum 5 years and maximum 40 years' imprisonment; Maximum \$5,000,000 fine; Minimum 4 years and maximum lifetime supervised release; \$100 special assessment; Potential denial of federal benefits; Potential deportation

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

MAGISTRATE CASE NO.

3:19-71206 EDL

Name and Office of Person Furnishing Information on this form DAVID L. ANDERSON

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) JULIE D. GARCIA

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

RUDIS VALLADERES-CACERES

DISTRICT COURT NUMBER
RUDIS VALLADERES-CACERES

WHA

CR19 DEFENDANT 0367

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges

2) Is a Fugitive

3) Is on Bail or Release from (show District) AUG 8 2019

SUSAN Y. ANDERSON
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

IS IN CUSTODY

4) On this charge

5) On another conviction } Federal State

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
been filed? No

} If "Yes"
give date
filed

DATE OF
ARREST

Month/Day/Year
August 7, 2019

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

ADDITIONAL INFORMATION OR COMMENTS

This report amends AO 257 previously submitted

1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney
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FILED
AUG -8 2019
SUSAN M. COOPER
CLERK OF COURT
NORTHERN DISTRICT OF CALIFORNIA

WHA

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 EDUARDO ALFONSO VIERA-CHIRINOS,

17 a/k/a "Rojo";

18 VICTOR MANUEL VIERA-CHIRINOS,

19 a/k/a "Mojarra";

20 JORGE ALBERTO VIERA-CHIRINOS;

21 JULIO CESAR VIERA-CHIRINOS,

22 a/k/a "Chino";

23 JORGE ENRIQUE TORRES-VIERA,

24 a/k/a "Enrique";

25 KAREN CASTRO-TORRES,

26 a/k/a "Delany Ellith Cardona

27 Velasquez";

28 CILDER RAMON GAMEZ-VELASQUEZ;

ALEXANDER GONZALEZ-VASQUEZ,

a/k/a "Ale";

GUSTAVO ADOLFO GAMEZ-VELASQUEZ;

a/k/a "Bomba";

LUIS ALMICAR ERAZO-CENTENO,

a/k/a "Pika";

(cont'd)

CR19 CASH

0367

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances;
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Controlled Substances;
21 U.S.C. § 853 – Forfeiture Allegation

1 RODULIO ALEXO GARCIA; •)
2 JUAN VELASQUEZ-ESCOTO, •)
3 a/k/a "Cuba";)
4 ELVIN MEJIA-PADILLA, •)
5 a/k/a "Pajaro";)
6 YORDI YABIER AGURCIA GALINDO; and)
7 RUDIS VALLADERES-CACERES,)
8 Defendants.)
9

10 I N D I C T M E N T

11 The Grand Jury charges:

12 COUNT ONE: (21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(B) – Conspiracy to Distribute and
13 Possess with Intent to Distribute Heroin, Methamphetamine, Cocaine Base, and
14 Cocaine)

15 Beginning on a date unknown to the grand jury, but no later than in or about June 2018, and
16 continuing to on or about August 7, 2019, in the Northern District of California and elsewhere, the
17 defendants,

18 EDUARDO ALFONSO VIERA-CHIRINOS,
19 a/k/a "Rojo";
20 VICTOR MANUEL VIERA-CHIRINOS,
21 a/k/a "Mojarra";
22 JORGE ALBERTO VIERA-CHIRINOS;
23 JORGE ENRIQUE TORRES-VIERA,
24 a/k/a "Enrique";
25 KAREN CASTRO-TORRES,
26 a/k/a "Delany Ellieth Cardona Velasquez";
27 CILDER RAMON GAMEZ-VELASQUEZ;
28 ALEXANDER GONZALEZ-VASQUEZ,
a/k/a "Ale";
GUSTAVO ADOLFO GAMEZ-VELASQUEZ,
a/k/a "Bomba";
LUIS ALMICAR ERAZO-CENTENO,
a/k/a "Pika";
RODULIO ALEXO GARCIA;
JUAN VELASQUEZ-ESCOTO,
a/k/a "Cuba";
ELVIN MEJIA-PADILLA,
a/k/a "Pajaro";
YORDI YABIER AGURCIA GALINDO; and
RUDIS VALLADERES-CACERES,

1 and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute
2 and possess with intent to distribute 100 grams and more of a mixture and substance containing a
3 detectable amount of heroin, a Schedule I controlled substance; 50 grams and more of a mixture and
4 substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its
5 isomers, a Schedule II controlled substance; 28 grams and more of a mixture and substance containing a
6 detectable amount of cocaine base, a Schedule II controlled substance; and 500 grams and more of a
7 mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric
8 isomers, and salts of its isomers, a Schedule II controlled substance, all in violation of Title 21, United
9 States Code, Sections 846, 841(a)(1) and (b)(1)(B).

10

11 COUNT TWO: (21 U.S.C. § 841(a)(1) and (b)(1)(A) – Possession with Intent to Distribute One
12 Kilogram and More of a Mixture and Substance Containing Heroin and 500
13 Grams and More of a Mixture and Substance Containing Cocaine)

14 On or about July 22, 2019, in the Northern District of California and elsewhere, the defendants,

15
16 EDUARDO ALFONSO VIERA-CHIRINOS, a/k/a “Rojo,” and
17 ALEXANDER GONZALEZ-VASQUEZ, a/k/a “Ale,”

18 did knowingly and intentionally possess with intent to distribute one kilogram and more of a mixture
19 and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation
20 of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and 500 grams and more of a mixture
21 and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and
22 salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code,
23 Section 841(a)(1) and (b)(1)(B).

24 COUNT THREE: (21 U.S.C. § 841(a)(1) and (b)(1)(C) – Possession with Intent to
25 Distribute Heroin)

26 On or about June 5, 2018, in the Northern District of California, the defendant,

27 JULIO CESAR VIERA-CHIRINOS, a/k/a “Chino,”

28 did knowingly and intentionally possess with intent to distribute a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States
Code, Section 841(a)(1) and (b)(1)(C).

1 FORFEITURE ALLEGATION: (21 U.S.C. § 853(a))

2 The allegations contained above are hereby re-alleged and incorporated by reference for the
3 purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

4 Upon conviction of any of the offenses alleged in Counts One through Three above, the
5 defendants,

6 EDUARDO ALFONSO VIERA-CHIRINOS,
7 a/k/a "Rojo";
8 VICTOR MANUEL VIERA-CHIRINOS,
9 a/k/a "Mojarra";
10 JORGE ALBERTO VIERA-CHIRINOS;
11 JORGE ENRIQUE TORRES-VIERA,
12 a/k/a "Enrique";
13 JULIO CESAR VIERA-CHIRINOS,
14 a/k/a "Chino";
15 KAREN CASTRO-TORRES,
16 a/k/a "Delany Ellieth Cardona Velasquez";
17 CILDER RAMON GAMEZ-VELASQUEZ;
18 ALEXANDER GONZALEZ-VASQUEZ,
19 a/k/a "Ale";
20 GUSTAVO ADOLFO GAMEZ-VELASQUEZ,
21 a/k/a "Bomba";
22 LUIS ALMICAR ERAZO-CENTENO,
23 a/k/a "Pika";
24 RODULIO ALEXO GARCIA;
25 JUAN VELASQUEZ-ESCOTO,
26 a/k/a "Cuba";
27 ELVIN MEJIA-PADILLA,
28 a/k/a "Pajaro,"
29 YORDI YABIER AGURCIA GALINDO; and
30 RUDIS VALLADERES-CACERES,

31 shall forfeit to the United States all right, title, and interest in any property constituting and derived from
32 any proceeds the defendants obtained, directly or indirectly, as a result of such violations, and any
33 property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of
34 such violations, including but not limited to a forfeiture money judgment equal to the amount of
35 proceeds obtained as a result of the offense for which the defendant is convicted.

36 If any of the property described above, as a result of any act or omission of the defendants:

37 a. cannot be located upon exercise of due diligence;
38 b. has been transferred or sold to, or deposited with, a third party;

1 c. has been placed beyond the jurisdiction of the court;
2 d. has been substantially diminished in value; or
3 e. has been commingled with other property which cannot be divided without
4 difficulty,

5 the United States of America shall be entitled to forfeiture of substitute property of the defendant
6 pursuant to Title 21, United States Code, Section 853(p), up to the value of the property described
7 above.

8 All pursuant to Title 21, United States Code, Section 853, and Federal Rule of Criminal
9 Procedure 32.2.

10 DATED:

A TRUE BILL.



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FOREPERSON

DAVID L. ANDERSON
United States Attorney

Julie D. Garcia
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JULIE D. GARCIA
RYAN REZAEI
Assistant United States Attorneys